

# Be engaged

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Supplier Code of  
Conduct

**DECEMBER 2020**

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# Supplier Code of Conduct

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## About us

Eurocommercial Properties (Eurocommercial) is a long-term investor and manager of prime shopping centres in Belgium, France, Italy and Sweden. We have set clear Environmental, Social and Governance (ESG) objectives and targets and we are committed to creating sustainable retail properties, reducing our environmental impact and supporting communities where we are active.

## Responsible procurement

Supporting our suppliers is an important ingredient in meeting our ESG objectives. Eurocommercial work with trusted and experienced partners and require its suppliers and employees to commit to our Supplier Code of Conduct. We expect our suppliers to comply with the Environmental, Social and Governance standards which are applicable to all third parties including service providers, maintenance and construction companies and other (sub)contractors employed by Eurocommercial's property management teams. The Supplier Code of Conduct can be viewed on our corporate website.

## Compliance

We expect suppliers commissioned by Eurocommercial to comply with all relevant and applicable local and national laws and regulations and the ESG criteria set out in the Supplier Code of Conduct, but also encourage them to take appropriate additional measures that go beyond the Code. We expect all employees working on-site for our suppliers to be aware of the Code's content and to ensure that they fully understand and are compliant with it. Any non-compliance with the Code by a suppliers needs to be communicated to their main contact at Eurocommercial.

## To respect ethical and good business practices, we expect our suppliers to:

- **Act ethically, responsibly and with integrity:** Suppliers must maintain independence and objectivity at all times and must not offer, solicit, or accept any gift, benefit, consideration or anything of value that could compromise their ability to act fairly and professionally and in the best interests of Eurocommercial.
- **Eliminate anti-bribery and corruption:** Eurocommercial expects its suppliers to maintain the highest ethical standards of business conduct and prohibits all forms of bribery. We prohibit suppliers to offer, make any transfer or provide anything of value to any Government Official with the intention of securing or retaining business, or to gain any unfair business advantage.
- **Avoid any conflict of interest:** Suppliers are required to fulfil their contract and business activities to the best of their professional abilities and without any business or financial conflict of interest.
- **Prevent fraud:** Eurocommercial expects its suppliers to take all necessary measures to avoid fraud. Suppliers should report any suspicion of fraud promptly to the relevant authorities and to Eurocommercial, including situations where they believe an opportunity for fraud exists due to poor procedures or lack of effective controls.
- **Prevent money laundering:** Eurocommercial and its suppliers should not participate in or facilitate money laundering. To avoid the risk, a policy against money laundering must be in place, and employees should understand the policy, procedures and controls.
- **Keep data safe, secure and confidential in compliance with GDPR:** Suppliers should have secure systems to monitor or collect confidential information about Eurocommercial or its customers, tenants and visitors. Data cannot be used by the suppliers or shared with any third party without the consent of Eurocommercial.
- **Report on irregularities:** Suppliers should actively monitor its compliance with the Code and immediately report any incidents to Eurocommercial.

**To meet our environmental reduction targets, we expect our suppliers, contractors and service providers to:**

- **Reduce carbon emissions:** Eurocommercial aims to operate carbon neutral by 2030 and requires its suppliers to support this objective by reducing their impact by using sustainable transport methods, using energy efficient equipment and selecting materials with sustainable labels or certifications.
- **Meet governmental standards:** Respect and operate in accordance with local, national and European environmental legislation and standards including the Paris Agreement.
- **Minimise waste:** We expect our suppliers to minimise their waste, eliminate the use of hazardous waste and maximise separation and recycling. We have set a clear target to minimise waste sent directly to landfill and expect our suppliers to support us in achieving this target.
- **Procure sustainable materials:** We select building materials and maintenance products with the highest care and only use those with sustainability labels and certificates. We expect the manufacturer and/or purchaser of energy-intensive products and materials to understand that these items have a carbon footprint, and should have a roadmap to reduce that footprint. When the supplier is procuring or using timber, it must comply with environmental standards (e.g. FSC, PEFC, SFI certified or other certified). The supplier must be able to provide documentation illustrating that products are compliant with these requirements. The supplier must give preference in its sustainable procurement plan to products that have a lower environmental impact e.g. have ecolabels in place, are more efficient, generate less waste, are sourced locally and can be reused.
- **Minimise pollution:** We are actively looking for ways to minimise and prevent pollution (light, air, sound etc.) linked to our operations and which could harm our communities.
- **Understand and support ecosystems in which we operate:** Suppliers should respect biodiversity and ecosystems and assess any biodiversity effects resulting from their activities. Any disruption or negative impact should to be reported to Eurocommercial and rectified.
- **Professional standards:** Suppliers should have professional and or environmental policies and procedures in place for all employees. Third party property management will have a third party certified environmental management system in place (ISO 14001:2015 or another type of certification). It is strongly recommended that other supplier categories have similar accreditation for their business activities.
- **Work together with Eurocommercial:** During the building certification process (BREEAM), achieve environmental reduction targets, share best practices and provide an overview of the environmental impact of the supplier on request by Eurocommercial.
- **Limit nuisance during works:** Reduce nuisances that could possibly disturb the shopping experience of our customers (noise, dust, traffic, etc.). Inform tenants on the location and timing of works, reducing the impact on the community.

**We support the protection of basic human rights and we expect our suppliers, contractors and service providers to:**

- **Meet labour regulations,** including freedom of association and collective bargaining: Suppliers should recognize and respect the rights of employees to freely associate, organize and bargain collectively in accordance with state and federal laws without fear of harassment, intimidation, penalty or reprisal. In no circumstance does Eurocommercial allow its suppliers to operate with any forced or involuntary labour or use child labour during their operations. Suppliers should not force their employees to work excessive hours and must compensate employees fairly.
- **Provide a healthy and safe working environment:** Suppliers should follow all applicable laws, regulations and other governmental directives in the country in which they operate or any other location where production or work is undertaken to ensure a safe and healthy workplace for all personnel, including the personnel of indirect suppliers. Suppliers will prevent any unsafe situations arising from their activities that could impact tenants, customers or the community.
- **Provide equal opportunities.** No discriminatory actions can be taken to its employees with regards to race, colour, national origin, religion, sex, physical or medical condition, age, sexual orientation, gender identity/expression, handicap, disability etc. Suppliers should compensate their employees fairly and in line with local regulations in the country where they operate.
- **Monitor and reporting compliance on human rights issues:** Suppliers should provide documentation and complete reports when requested by Eurocommercial regarding the compliance of respecting any human rights clauses.

For questions about this Supplier Code of Conduct, please contact Eurocommercial at [info@eurocommercialproperties.com](mailto:info@eurocommercialproperties.com).